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Attorneys for Defendant Desert Palace LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

C. C., individually,

Plaintiff,

vs.

JAMAL F. RASHID a/k/a “MALLY
MALL,”; HIGHGATE HOTELS, L.P.;
RADISSON HOSPITALITY, INC.; WYNN
LAS VEGAS, LLC.; DESERT PALACE
LLC; NEVADA PROPERTY 1, LLC; ARIA
RESORT & CASINO LLC; MGM GRAND
HOTEL, LLC; STK LAS VEGAS, LLC;
THE ONE GROUP, LLC; THE ONE
GROUP HOSPITALITY, INC.; THE
LIGHT GROUP, LLC; and TAO GROUP
OPERATING, LLC,

Defendants.

Case No.: 2:23-cv-02056-GMN-BNW

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR
DEFENDANT DESERT PALACE
LLC TO RESPOND TO
PLAINTIFF’S SECOND AMENDED
COMPLAINT**

(FIRST REQUEST)

Pursuant to LR IA 6-1, Plaintiff C.C. (“Plaintiff”) and Defendant Desert Palace LLC (together, the “Parties”), by and through their respective counsel of record, hereby agree and stipulate as follows:

1. On March 29, 2024, this Court entered an Order on Stipulation to Dismiss Desert

1 Palace LLC without prejudice. (ECF No. 85).

2 2. On December 20, 2024, this Court dismissed Plaintiff's TVPRA claims without
3 prejudice as to most or all of the Parties. (ECF. No. 115).

4 3. That same day, this Court dismissed Plaintiff's state law claims (NRS 41.1399
5 and intentional infliction of emotional distress) with prejudice as to all of the Parties. (ECF. No.
6 115).

7 4. The Court at the same time granted Plaintiff leave to amend her complaint by
8 January 10, 2025. (ECF No. 115).

9 5. On January 10, 2025, Plaintiff filed a Motion for Leave to Amend her Complaint.
10 (ECF No. 117). Plaintiff's proposed Second Amended Complaint re-names Desert Palace LLC
11 and brings beneficiary and/or perpetrator liability claims under the TVPRA.

12 6. On January 27, 2025, this Court granted Plaintiff's Motion for Leave to Amend
13 her Complaint and directed the Clerk of Court to file Plaintiff's Second Amended Complaint on
14 the docket. (ECF No. 124).

15 7. On March 13, 2025, Plaintiff filed a returned Summons for Desert Palace LLC.
16 (ECF No. 136).

17 8. The Parties respectfully stipulate that Defendant's time to respond to the Second
18 Amended Complaint be extended from March 28, 2025 to April 11, 2025. This is Defendant's
19 first request to extend time to file a response to the Second Amended Complaint.

20 9. Good cause exists to enlarge the time for Defendant to respond to Plaintiff's
21 Second Amended Complaint because the parties have been discussing matters related to the
22 pleading and needed an opportunity to exhaust those discussions. This request is made in good
23 faith and not for purposes of delay.

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WHEREAS the Parties respectfully request that Desert Palace LLC shall have until April 11, 2025 to answer, move, or otherwise respond to Plaintiff's Second Amended Complaint.

IT IS SO STIPULATED.

DATED this 28th day of March, 2025.

McDONALD CARANO LLP

HILTON PARKER LLC

/s/ Kristen T. Gallagher

/s/ Geoffrey C. Parker

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Attorneys for Plaintiff C.C.

Attorneys for Defendant Desert Palace LLC

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: March 31, 2025